Case 2:13-cv-02113-APG-PAL Document 16 Filed 07/10/14 Page 1 of 2 1 Marc V. Kalagian Attorney at Law: 4460 211 East Ocean Boulevard, Suite 420 Long Beach, CA 90802 3 Tel: (562)437-7006 4 Fax: (562)432-2935 E-Mail: rohlfing.kalagian@rksslaw.com 5 Attorneys for Plaintiff KENNÉTH P. DE JESUS 6 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 11 KENNETH P. DE JESUS Case No.: 2:13-cv-02113-APG-PAL 12 STIPULATION TO EXTEND TIME Plaintiff, 13 v. TO FILE MOTION FOR REMAND AND/OR REVERSAL 14 CAROLYN W. COLVIN, Acting Commissioner of Social Security. (FIRST REQUEST) 15 Defendant. 16 17 18 Plaintiff Kenneth P. De Jesus and Defendant Carolyn W. Colvin, Acting 19 Commissioner of Social Security, through their undersigned attorneys, stipulate, 20 subject to this court's approval, to extend the time by 60 days from July 9, 2014 to 21 September 7, 2014 for Plaintiff to file his Motion for Remand and/or Reversal, 22 with all other dates in the Court's Order Concerning Review Of Social Security 23 Cases extended accordingly. This is Plaintiff's first request for an extension. 24

-1-

25

26

Case 2:13-cv-02113-APG-PAL Document 16 Filed 07/10/14 Page 2 of 2

ı	
1	This request is made at the request of Plaintiff's counsel to allow additional time to
2	fully research the issues presented.
3	DATE: July 9, 2014 Respectfully submitted,
4	ROHLFING & KALAGIAN, LLP
5	/s/ Marc V. Kalagian
6	BY: Marc V. Kalagian
7	Attorney for plaintiff Mr. Kenneth P. De Jesus
8	
9	DATE: July 9, 2014
10	DANIEL G. BOGDEN United States Attorney
11	/s/ Heather M. Moss
12	BY: HEATHER M. MOSS
13	Assistant Regional Counsel Attorneys for defendant Carolyn W. Colvin
14	*authorized by e-mail
15	
16	IT IS SO ORDERED: Jeggy a. Jeen
17	UNITED STATES MAGISTRATE JUDGE
18	DATED: July 10, 2014.
19	
20	
21	
22	
23	
24	
25	
26	